Greater Maple Valley Area Council
P.O. Box 101
Maple Valley, WA 98038-0101
April 3, 1996

David L. South
Department of Ecology
3190 160th Avenue Southeast
Bellevue, WA 98008-5452

These comments relate to the Remedial Investigation/Feasibility Study Report on the Landsburg Mine Site.

At the public meeting on Wednesday, March 27, 1996 at Tahoma Junior. High School, one of the citizens living in the vicinity of the site, Richard Melewski, stated that there were seven cases of cancer within a one mile radius of the site. One of these cases is his daughter.(These data were also reported in the *Valley Daily News*, April 1, 1996, page A4.) David South's response was that health investigations were the responsibility of Washington State's Department of Health, not the Department of Ecology. He also stated that, in his opinion, it was unlikely that a health investigation would be initiated.

The Area Council believes that this unusual concentration of cancer cases should be investigated by the Washington State Department of Health and if necessary, an epidemiological study be conducted to compare the health histories of children living close to the site with those living sufficiently far removed that they would not be subject to effects of the site.

We do not presume to understand the cause or causes of what appears to be a serious health concern but we do believe it warrants a through investigation by competent health professionals. a

The Area Council is also concerned that the DOE plans call for terminating the monitoring of the groundwater test wells after only 20 years. Recognizing that in some cases contaminants migrate very slowly, tens of feet or even feet per year, we believe that monitoring, perhaps at a reduced rate, should continue for at least 50 years. b

The Greater Maple Valley Area Council is a 15 member elected group of citizens representing this community in Southeast King County for over 20 years. The Landsburg Mine Site is within the area we represent.

Very truly yours,

W. G. Beck

for Terry Seaman
Corresponding Secretary

c.c.
State Senator Kathleen Drew
State Representatives Phil Dyer and Brian Thomas
US Senators Slade Gorton and Patty Murray
US Representative Jennifer Dunn
Washington State Department of Health
Metro King County Health Department
Richard Melewski

WASTE ACTION PROJECT

RECEIVED
APR 26 1996
DEPT. OF ECOLOGY

David South
Department of Ecology
Delivered by fax 649-7098
(Hard copy)

Re: Landsburg Mine Site RI/FS comment

Dear Mr. South:

To start with I would like to state my appreciation for the effort by yourself, Ecology and the many others who worked on developing this RI/FS.

The first part of my comments is a preamble of sorts. Waste disposal at this site was an operation carried out for many years as part of the active mining operation. Waste was sampled/recovered out of drums as late as 1991. Waste product was reported by a mine worker in the south mine sump, shortly after disposal of oily waste at the north end of the trench. A major irreplaceable water supply (City of Kent) is located a short distance from the south portal of the mine. Disposal of wastes, including drums has taken place outside of the north trench, including drums that are still visible just east of the south portal. When I discovered these drums in the mid to late 1970s, at least one was labeled as containing solvents.

On the conclusions of the RI as presented on page iii, of the RI/FS, Vol. I:

On the nature and extent of contaminants, the assumption that contaminants do not appear to be exiting the mine appear to be based on the assumption that all the wastes were deposited in the mine trench. As stated above, this is not true, as waste drums and other materials are deposited just north of Kent Kangley Road, east of the south portal. From all indications and appearances, these drums were part of the mining/disposal operation during the 1960-1975 time frame. As such these waste must be characterized and removed as part of the actions contemplated by the RI/FS. It is not acceptable these wastes continue to sit at the surface, exposed to weather across the street from the City of Kent's water supply.	a
As stated above, reports from miners indicate that waste migrated from the north end of the trench where disposal was occurring to the south mine sump. The south mine sump was not "within that portion of the trench known to have been used for prior waste disposal". Please revise and correct this error and correct any conclusions and recommendations based on the errors detailed above.	b
On source characteristics, as stated above, the statement that wastes are confined to the northern half of the trench in the context of information sources given is false. Historical information in the form of mine reports shows this in fact is not the case and waste did escape the north end of the trench.	c
Have all mine openings that were closed by blasting (section 3.2.1), been field located and sampled for the presence of waste?	d
If the answer to this question is no, all such opening need to be identified and sampled for waste, as soon as possible. This information is necessary for the RI/FS to be deemed complete.	e

(206) 622-7803 / P.O. Box 4832, Seattle Washington 98104

Section 3.2.1, discusses the variety of wastes disposed of at the mine site. A waste category not mentioned is solvent still bottoms. This waste was received from Chem-Pro, and generated by the Boeing Airplane Company. I received this information from Ron West, former owner of Chem-Pro. The history portion of this section also fails to mention the case Ecology had before the Pollution Control Hearings Board related to disposal of waste at the Landsburg site. The papers filed in the case include field observations on the nature and migration of waste by Ecology personnel. This information needs to be included in and considered as part of the RI/FS. f

The information given for 1983 in this section is incorrect. As I am the person who reported this disposal, I can from first hand knowledge state that oil and or tar sludge was also disposed of in 1983. This information was provided to EPA, Ecology, the City of Kent and others. g

Section 3.5.1.3, in the final paragraph deals with a pond located on the southwest side of the hill located east of the trench. The text states that the pond discharge via a culvert ceases during summer months. I have checked this discharge periodically since the mid 1970s, and frequently noted it discharging in the summer months. h

On potential future pathways of chemicals exiting the mine, waste is not limited to the north end of the mine. The text appears to state that groundwater flow from the north half of the trench flows to the north. There does not appear to be solid data justifying this conclusion. No evidence of the placement of a groundwater divide is presented. No water balance for the trench or the site has been performed. Deeper groundwater in the mine has yet to be monitored at all. The statement that "The chance that such a discharge could occur at the southern end is unlikely given the direction of flow and the absence of waste in this portions of the mine.", does not appear to be based on facts as noted in comments above or data collected to date. Please indicate where the groundwater divide that separates north trending flow from south trending flow is located. Please indicate how this divide is affected with depth. i

The section on ARARs does not seem complete. The site was operated (illegally) as a hazardous waste disposal site. The two major regulations cited relate to MTCA and the Minimum Functional Standards for Solid Waste, minor lip service is given to the dangerous waste regulations. Where is mention of the Resource Conservation Recovery Act and appropriate regulations related to the operation and closure of a hazardous waste disposal facility. The MTCA closure must be able to demonstrate that the remediation selected is consistent, or substantially equivalent with the federal requirements of the delegated federal program. j

The section on the adequacy of the RI/FS is inaccurate. As stated above, there are inadequacies in the document that would render a decision by Ecology incomplete or in error unless the document is corrected. k

In summary, wastes disposed of outside of the trench such as the drums adjacent to Kent Kangley Road need to be identified and removed now. Historical information on the location and migration of wastes such as the mine sump report and papers filed by Ecology with the PCHB need to be included in the RI/FS and to the extent the information conflicts with the results, conclusion or assumptions in the report, the report needs to be changed. Investigation of seeps and discharges from around the site do not appear to be adequate to address potential pathways of released. The model presented of the trench sealed on both sides with all discharge of contaminants going north is simplistic and based on inadequate data. While there may be financial reasons for not wanting to extensively investigate and define all chemical and flow characteristics related to this site, for assumptions made based on inadequate data, there need to be safe guards instituted to assure the lack of information is not going to allow unexpected migration of contaminants impose serious harm. The critical and sensitive nature of the City of Kent's drinking water supply is understated and undervalued by the document. The document fails to consider or explain how actions contemplated in the FS will be consistent with federal requirements for hazardous waste disposal sites (such as the requirements of RCRA). The RI data is inadequate as previously noted. l

Another troubling lack of information relates to community health risks. There is no mention of the numerous fires that occurred in the trench or how this would have transported hazardous wastes outside the trench and deposited them in the surrounding area. m

The Remedial Action Objectives are inadequate as they do not consider the waste known to be (but not sampled or characterized) outside the trench. The alternatives as defined are inadequate as they do not address waste known to be placed outside the trench, allowing those waste to continue to be in contact with weather, with the resulting risks of migration via surface water and groundwater. The selected alternative must address the wastes outside the trench to adequately protect public health, the environment and meet community concerns. There is no mention of public concerns related to incidence of cancer in the area immediately surrounding the site, or that there may be a connection between the fires that took place and cancers in the surrounding community. The chosen FS alternative must include health monitoring for nearby residents, especially those who were exposed or whose birth parents were exposed to the fires that occurred at the site.

n

o

I have run out of time to comment. I look forward to providing additional comments as work on this site continues.

Greg Wingard, President

24735 Summit Landsburg Rd.
Ravensdale, WA. 98051
(206) 432-4053
April 6, 1996

David South, Landsburg Mine Site Manager
Department of Ecology
N.W. Regional Office
3190 160th Ave. S.E.
Bellevue, WA. 98008-5452

Dear Mr. South:

This letter is in response to the proposed alternative cleanup plan for the Landsburg Mine Site. Cleanup alternative 5: backfill and cap, is not an acceptable plan for the Landsburg Site. The nature and quantity of the chemicals, metals and VOCs, dumped at the mine makes it a potential "time bomb". Human health and the environment would be severly impacted if the waste migrates off site. a

Palmer Coking Coal Co. records indicate that between April of 1969 and August of 1971, 162,600 gallons of solvent was pumped into the mine directly from tanker trucks. During the same two year period Palmer records show that 4,563 55 gallon barrels were deposited at the site. The figures are based on Palmer Coking Coal records. It is quite possible that all of the dumping was not documented. There is some speculation the site may contain as many as 50,000 55 gallon barrels (Valley Daily News, September 5, 1991). b

Cleanup alternative 5 was chosen after extensive testing. In one of the testing procedures an instrument called a magnetometer was used. This instrument tests for the presence of ferrous materials. According to the RI/FS for the Landsburg Mine, Zone 2 registered extremely high levels of ferrous material. It is a known fact the trench was used as a dump for old household appliances, but is difficult to believe that the majority of the ferrous material is old refrigerators and stoves. c

Another argument for cleanup alternative 5 seems to be based on a description of the geology in the area. A description of the geology is just that, a description. There is no concrete scientific evidence to guarantee that toxic waste will not migrate off the site. d

Proposed cleanup alternative 5 calls for the installation of a "cap" which is suppose to minimize the amount of rain water permeating the mine surface. Rainwater is not the major problem at the Landsburg Mine. Past records indicate that between 1972 and 1975 several power outages occured for a duration of 24 hours or more. When that happened the mine would fill with up 5 feet of water. This was caused by pump failure. The problem of water in e

the trench was addressed during the RI/FS. The following statement is based on the results of the investigation: "these observed results generally support the contention that the Rogers coal seam is highly conductive and capable of rapidly transmitting large quantities of water (1.5 cm/s)".

It is difficult to believe, given the nature and quantity of the toxic waste at the Landsburg Site, that cleanup alternative 5 was chosen. There is a possibility that hazardous waste could leach out of the mine and into the groundwater. In that case, risk to human health and the environment would be extensive. The risk of ingestion through drinking water would be a real fact. Most organics do not dissolve in water. However, some such as toluene and benzene are slightly soluable in water (The Merck Index). f

In the January Journal Of Occupational and Environmental Medicine, researchers reported that ingesting VOCs, via drinking water, is not as harmful as inhaling them, via bathing or showering. Ingested VOCs are metabolized rapidly by the liver. VOCs inhaled or absorbed through the skin can remain in the blood for up to 4 hours or more. This would allow distribution through the body.

The only reasonable cleanup alternative for The Landsburg Site is alternative 9: excavation and off-site disposal of all waste and affected soil. This alternative would offer a permanent solution to the maximum extent possibe (MTCA regulations). Contaminated groundwater would have the potential to impact the Ravensdale/Maple Valley area, and, the cities Kent (Clark Springs), Renton and Seattle (Cedar River). Any other plan would be in direct violation of MTCAs directives: "to acomplish effective and expeditious cleanups in a manner that protects human health and the environment". g

Sincerely,

Kathleen J. Toensjost

Ralph F. Toensjost

Kathleen J. Toensjost
Ralph F. Toensjost

(4)

RECEIVED
APR 15 1996
DEPT. OF ECOLOGY

April 12, 1996

Marie L. South
Site Manager
Department of Ecology
3190 160th Avenue S.E.
Bellevue WA 98008-5452

Re: Comments Landsburg Mine

Dear Sir:

In reference to the Landsburg Mine site Cleanup Update:

a. Could the "cap" prevent the venting of barrel contents making it possible for a force to build up that could cause an explosion?

b. If not would present natural vegetation from permeating the cap allowing water to permeate the dump trench?

c. If not will present target shooting at the cap?

d. I quote from your paper "Chemicals associated with the waste were found, but only in the soils in the area where waste disposal occurred". If someone took property samples from us - why weren't we notified & if not why not? Our property is located at the 900' level directly east of the Landsburg mine site & drops with the surrounding terrain. Our property should have been tested and we would like a record of the tests, dates, and results... for our records. We have lived here since 1961. Our Lots are 25-22-06 Block 9014, 25-22-06 Block 9119, Lot 8, Lots 9 & 10 - totaling over 53 acres.
& Herbert Uppers Addition to Ravensdale (Unrecorded)

Please contact me about these concerns and include them in your public input of the clean up process.

Sincerely,

Sonia S. Preedy
P.O. Box 174
Ravensdale WA. 98051

phone 206 432 0402

e P.S. We personally observed ash falling around our home during previous Mt. St. Helens eruptions and burnings and want to know if the soil around our home contains elements that would be dangerous for gardening or personal contact.

April 10 1996

David South
Department of Ecology
3190 160th Ave. S.E.
Bellevue, Wash. 98008-5452

Concerning: Landsburg Mine

Dear David South.

I wish to provide my public comment onthe Remideal Investigation - Feasability Study of which I was informed. I have lived in this area all of my life and was around when they were dumping material into the big trench. As far as I'm concerned most of the material burned up in the huge fires they had up there the summer of '71. I remember you could see flames for a long distance. The best thing to do with this trench is to fill it in and plant grass on. Then the elk and deer could come out of the woods and have a good place to graze. a

And while you're filling up the trench, why not use the old stockpiles of coal slag that are all around this area. I understand that the carbon in the coal makes a good filter anyway. b

I think a common sense approach is the best approach. Thank you. c

Cordially Yours

James Holder

James Holder
P.O. Box 62
Hobart, WA 98025